

Duff Law PLLC

Anderson J. Duff
Managing Member
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June 20, 2023

MEMO ENDORSED

VIA ECF ONLY

Honorable Laura Taylor Swain
United States District Court
Southern District of New York
40 Foley Square, Room 17C
New York, New York 10007-1312

Re: *Annamarie Trombetta v. Norb Novocin, et al.*, Case No. 18-cv-0993-RA-SLC

Dear Judge Swain:

Today Plaintiff Annamarie Trombetta ("Plaintiff") filed a letter motion requesting an extension of today's deadline for both Plaintiff's Reply and the EAI/Novocins' Reply to relevant motions for summary judgment. (ECF No. 505.) In Plaintiff's letter motion, Plaintiff states that I offered to draft a letter motion for her requesting those extensions but did not do so. To the contrary, I sent Plaintiff a draft letter motion for her approval at 1:50 p.m. ET. A true and correct copy of that email is attached hereto as Exhibit A. Counsel for Defendant Worthpoint consented to the version attached as Exhibit A, but I did not hear back from Plaintiff. The remainder of this letter is exactly as shown in Exhibit A.

Presently pending before the Court are the Parties' respective motions for summary judgment, the Replies for all of which are outstanding. Per Judge Abrams' *Pro Se* Rules, the party filing a Reply has two weeks from the filing of the Opposition. Judge Abrams previously granted an additional week's extension in response to Plaintiff's request for an extension of time on the opposition, and the Defendants were also given an additional week on the Replies. *See* ECF Nos. 395, 491. Additionally, Judge Abrams' Order, ECF No. 395, previously granted a 10-page extension of the page limitation on all briefs. For the Reply briefs, Judge Abrams normally has a 10-page limit, same as Your Honor's rules. Given the previously-granted extensions, the EAI/Novocin Defendants along with Plaintiff who is proceeding *pro se* respectfully request that all Replies on the pending motions for summary judgment (Plaintiff's Reply and Defendants EAI/Novocins' Reply currently due today, June 20) be adjourned to June 29, 2023 (the date that Defendant WorthPoint's Reply is due) and that each Party's Reply brief in further support of their respective Motions for Summary Judgment be extended to not more than 20 pages in total (tables of contents and authorities excluded).

I have conferred with Plaintiff, who would like the same extension, and Jana Farmer, counsel for Defendant WorthPoint, who consents to our request.

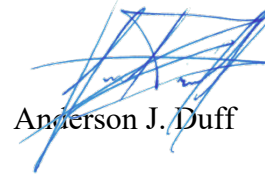
Thank you for Your Honor's attention to this matter.

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Respectfully submitted,

By:



Anderson J. Duff

AJD/jo
cc:
Annamarie Trombetta
Jana Farmer
Adam Bialek

The foregoing request is granted. The deadline for Plaintiff and Defendants' replies in support of their motions for summary judgment is hereby extended to June 29, 2023. The page limit for the replies is also extended to twenty pages. This resolves docket entry nos. 505 and 506. SO ORDERED.

Dated: 6/21/2023
/s/ Laura Taylor Swain, Chief U.S.D.J.

EXHIBIT A
Email to All Parties



Anderson Duff <ajd@hoganduff.com>

Plaintiff's Letter for an Extension

Anderson Duff <ajd@hoganduff.com>

Tue, Jun 20, 2023 at 1:50 PM

To: Annamarie Trombetta <annamarietrombettalegal@outlook.com>

Cc: "Bialek, Adam" <Adam.Bialek@wilsonelser.com>, "Cahill, John" <John.Cahill@wilsonelser.com>, "Farmer, Jana S." <Jana.Farmer@wilsonelser.com>

Please find my draft letter to Judge Swain attached for your review. The date is incorrect. I will correct it before filing.
Please confirm that I may file this letter at your earliest convenience. Have a good afternoon.

[Quoted text hidden]

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Best,

-Anderson-
646.450.3607



6.20.23 - LTR Judge Swain.docx

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May 30, 2023

VIA ECF ONLY

Honorable Laura Taylor Swain
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Re: *Annamarie Trombetta v. Norb Novocin, et al.*, Case No. 18-cv-0993-RA-SLC

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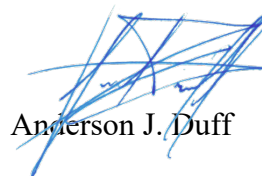
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Respectfully submitted,

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